

Via ECF

January 15, 2025

The Honorable Kiyo Matsumoto
United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Greebel, 15-CR-0637 (KAM)

Dear Judge Matsumoto:

We write, with the consent of the United States, to respectfully request a 14-day extension of time, from January 17, 2025 to January 31, 2025 for the parties to submit amended proposed stipulations and orders of garnishment (the “Amended Garnishment Orders”).

As represented in defendant Evan Greebel’s (the “Defendant”) September 27, 2024 motion for an extension of time to file [Dkt. 799] and in the United States’s motion for an extension of time to file [Dkt. 800], the parties have reached an agreement in principle that will resolve the outstanding issues in this matter without the need for further litigation. The Court granted the parties’ September 27 motion on September 30, 2024, and directed the parties to “submit amended proposed stipulations and orders of garnishment by December 2, 2024.” Docket Entry dated September 30, 2024. The Court then granted the parties’ November 27, 2024 motion that same day, and directed the parties to “file amended proposed stipulations and orders of garnishment by December 20, 2024.” Docket Entry dated November 27, 2024. The Court granted the parties’ December 18, 2024 motion that same day, and directed the parties to “file amended proposed stipulations and orders of garnishment by January 17, 2025.” Docket Entry dated December 18, 2024.

This request is being made to give the parties time to finalize the language of the Amended Garnishment Orders, which would effectuate the parties’ agreement in this action. The parties have engaged in good faith discussions to resolve several outstanding mechanical and tax planning issues that may arise as a result of the Amended Garnishment Orders’ enforcement. The request is also being made given that the undersigned is still on paternity leave as of December 17, 2024. The Defendant thanks the Court for its attention to this matter.

Respectfully,

/s/ Marc Aaron Takagaki

Marc Aaron Takagaki

The Honorable Kiyo Matsumoto
United States District Court for the Eastern District of New York
November 9, 2022
Page 2

Cc: All Counsel of Record (via ECF)